

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
(Charleston Division)**

BISHOP OF CHARLESTON,  
a Corporation Sole, d/b/a The Roman  
Catholic Diocese of Charleston;  
and

SOUTH CAROLINA INDEPENDENT  
COLLEGES AND UNIVERSITIES, Inc.;

*Plaintiffs,*

v.

MARCIA ADAMS, in her official capacity as  
the Executive Director of the South Carolina  
Department of Administration; and

BRIAN GAINES, in his official capacity as  
budget director, Department of  
Administration, State of South Carolina; and

HENRY MCMASTER, in his official  
capacity as Governor of South Carolina;

*Defendants.*

Case No. \_\_\_\_\_

**DECLARATION OF WILLIAM RYAN**

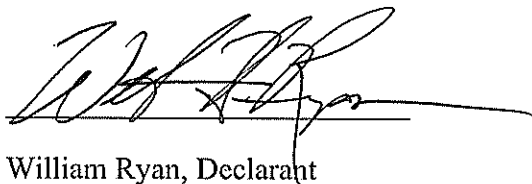
Pursuant to 28 U.S.C. § 1746, I declare that the following facts are true, to the best of my knowledge, information, and belief:

1. My name is William Ryan. I am an adult of sound mind. I am a resident of South Carolina.
2. In my professional capacity, I am Secretary for Education and Superintendent of Catholic Schools for the Roman Catholic Diocese of Charleston, whose civil law presence is Bishop of Charleston, a Corporation Sole ("the Diocese"). The Diocese of Charleston encompasses the entire State of South Carolina.
3. Because Roman Catholics believe, and Canon Law provides, that parents are the primary educators of their children, the Diocese supports the freedom of parents to choose a school for their children that will provide a safe, productive learning environment and rejection of the notion that a parent's address and income level should determine a child's educational or child care opportunities.

4. To that end, the Diocese supports any school choice program that ensures equal educational choices for families in South Carolina.
5. As part of our advocacy efforts, the Diocese endorsed and supported Governor McMaster's use of the CARES Act's Governor's Emergency Educational Relief (GEER) funds to create the Safe Access to Flexible Education (SAFE) grants program.
6. When the Governor announced the program, the Diocese released the following statement: "We applaud Gov. McMaster for ensuring South Carolina students can remain in the schools of their choice during these incredibly challenging times. This program will provide families across our state the stability they deserve as they face economic hardship and an uncertain future due to COVID-19. We look forward to welcoming new students into our Catholic classrooms in the fall."
7. Once the Governor announced the SAFE Grants program, the Diocese invested resources in promoting the SAFE grants program for the 33 Catholic schools within the Diocese.
8. The Diocese communicated with principals, parents and others about the SAFE Grants program as a tool to support low- and moderate-income families currently enrolled in the Diocese's 33 Catholic schools and those who would want and be able to enroll their children in our schools with the support of this program.
9. Application of the Blaine Amendment as advocated by opponents of the SAFE Grants program has directly injured the Diocese in a material way. It has prevented the diocesan schools from enrolling new students whose parents are seeking a safe, effective in-person learning option for their children when that option was not otherwise available or deemed adequate and/or safe by them, but who would only be able to afford such option if funded thru SAFE. In addition, through the SAFE program, the Diocese would have been able to prevent the loss of families who were previously enrolled but who can no longer afford to pay tuition due to the impact on them of the economic downturn that has accompanied COVID-19.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: April 13, 2021



William Ryan, Declarant